



4. Movant attaches the Affidavit of Due Diligence in support of this Motion for Substitute of Service of Process and incorporates it herein by reference as, Exhibit “A.”
5. Movant ask this court to authorize Movant to serve Defendant GHION TSEGA by leaving a true and current copy of the Summons along with *Plaintiff's Original Petition* and the Summons with anyone over the age of sixteen (16) years at 1808 Bent Cove, Leander, Williamson County, Texas, 78641 or by securely attaching it to Defendant, GHION TSEGA’S door frame at his place of residence or any other means that would give the Defendant, GHION TSEGA reasonable notice as set out in Rule 106(b) of the Texas Rules of Civil Procedure.

**PRAYER**

Movant prays that this Court enter an order authorizing substituted service for Defendant GHION TSEGA at 1808 Bent Cove, Leander, Williamson County, Texas, 78641 in support of this Motion for Substitute Service.

Respectfully submitted,

THE LAW OFFICE OF THOMAS J. HENRY  
5711 University Heights Blvd. Suite #101  
San Antonio, Texas 78249  
Telephone: (361) 985-0600  
Facsimile: (361) 985-0601

By: /s/Syreeta Alexander  
Syreeta Alexander  
State Bar Number: 24058849  
salexander@thomasjhenrylaw.com  
\* [salexander-svc@thomasjhenrylaw.com](mailto:salexander-svc@thomasjhenrylaw.com)  
**COUNSEL FOR PLAINTIFF**  
**\*service by email to this address only.**

**CERTIFICATE OF CONFERENCE**

Plaintiff is unable to confer with the remaining defendants because they have not answered the suit. The remaining Defendants were served with the Summons on August 18, 2020.

/s/Syreeta Alexander  
Syreeta Alexander

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of September 2020 a true and correct copy of this document has been served in accordance with the Federal Rules of Civil Procedure up the following:

Via Certified Mail Return Receipt Requested:

THE KENAN ADVANTAGE GROUP, INC.  
Registered Agent  
CT Corporation System  
400 Easton Commons Way, Suite 125  
Columbus, Ohio, 43219

KENAN TRANSPORT, LLC  
Registered Agent  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, Texas 75201-3136

PETRO CHEMICAL TRANSPORT, LLC  
Registered Agent  
CT Corporation System  
1999 Bryan Street, Suite 900  
Dallas, Texas 75201-3136

/s/Syreeta Alexander  
Syreeta Alexander

**Exhibit "A"**

**AFFIDAVIT OF DUE DILIGENCE**

**State of Texas**

**County of Western**

Case Number: 1:20-CV-771RP

Plaintiff:

**FOAD ASSOU**



CAN2020000384

vs.

Defendant:

**THE KENAN ADVANTAGE GROUP, INC., KENAN TRANSPORT, LLC,  
PETRO CHEMICAL TRANSPORT, LLC., and GHION TSEGA**

For:

Pronto Process  
1406 W Salinas  
San Antonio, TX 78207

Received by Pronto Process on the 14th day of August, 2020 at 2:28 pm to be served on **Ghion Tsega, 1808 Bent Oak Cove, Leander, Williamson County, TX 78641.**

I, Emmanuel Morales, being duly sworn, depose and say that on the **17th day of August, 2020 at 4:57 pm,**  
I:

**NON-SERVED the Summons and Plaintiff's Original Complaint; Jury Demanded.** After due search, careful inquiry and diligent attempts was unable to serve on **Ghion Tsega** for the reasons detailed in the comments below.

**Additional Information pertaining to this Service:**

8/15/2020 12:05 pm Attempted service at 1808 Bent Oak Cove, Leander, TX 78641, vehicle in driveway Jsk 6827, spoke with female said not home left my calling card to contact me  
8/15/2020 12:16 pm I received call phone number 512-733-3342 said is not available working out of town. asked me what it was regarding thanks, it was a document to be delivered personally stated don't know when he'll be available

8/15/2020 12:40 pm Attempted service at 1808 Bent Oak Cove, Leander, TX 78641, received call from tsega stated what is it Regarding why am I calling him. Explained again I have a document to deliver. asked what it was regarding I explained what it was and mentioned I needed to deliver personally he then hung up the phone. I called him back he stated stop calling me this is harassment yelling and hung up the phone.

**Avoiding service**

8/17/2020 10:18 am vehicle is registered to SOSINA ALEMAYEHU who lives at 1808 Bent Oak Cove, Leander

8/17/2020 10:40 am Attempted service at 1808 Bent Oak Cove, Leander, TX 78641 no vehicles in drive . I knocked on door. No answer. I left my calling card to contact me.

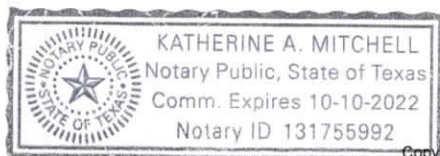
**Exhibit "A"**

**AFFIDAVIT OF DUE DILIGENCE For 1:20-CV-771RP**

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103, 501, and 501.2 of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am competent to make this oath; I am not less than 18 years of age, I am not a party to the above-referenced cause, I have not been convicted of a felony or a crime of moral turpitude, and I am not interested in the outcome of the above-referenced cause.

Subscribed and Sworn to before me on the 18th day of August, 2020 by the affiant who is personally known to me.

  
NOTARY PUBLIC





**Emmanuel Morales**  
PSC # 10708 Exp. 12/31/2021

**Pronto Process**  
1406 W Salinas  
San Antonio, TX 78207  
(210) 226-7192

Our Job Serial Number: CAN-2020000384  
Ref: 20-7026